

RBL/JBR

08711-09017

2166500

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EFRAIN SANCHEZ	)	
	)	No. 08 C 2735
Plaintiff	)	
vs.	)	Judge John W. Darrah
	)	
CITY OF CHICAGO, CHICAGO POLICE	)	Magistrate Judge Jeffrey Cole
OFFICER RICK CABALLERO,	)	
Star #11141, and AS YET UNKNOWN	)	
CHICAGO POLICE OFFICERS,	)	
	)	
Defendants.	)	

**MOTION FOR WITHDRAWAL AND SUBSTITUTION OF APPEARANCES**

NOW COME, CITY OF CHICAGO, CHICAGO POLICE OFFICER RICK CABALLERO, Star #11141, (hereinafter "Defendants") by their attorneys, Richard B. Levy and Juanita B. Rodriguez, of JOHNSON & BELL, LTD., and move this Court for the entry of an Order allowing Kathleen Dolores Manion and Tiffany Yvette Harris, to withdraw as attorneys for Defendants and entering the appearances of Richard B. Levy and Juanita B. Rodriguez in substitution. In support of its motion, Defendants state as follows:

1. Defendants' Counsel Kathleen Dolores Manion, entered an appearance as attorney of record on June 13, 2008 on behalf of the Defendants.

2. Defendants' Counsel Tiffany Yvette Harris, entered an appearance as attorney of record on December 5, 2008 on behalf of the Defendants.

3. Defendants have retained Johnson & Bell to represent Defendants in the above-captioned matter.

4. Defendants seek to have the appearances of Ms. Manion and Ms. Harris withdrawn and their names removed from the service list in this matter.

5. Defendants further seek leave for the appearances of attorneys Richard B. Levy and

Juanita B. Rodriguez. Mr. Levy and Ms. Rodriguez are both licensed by the Supreme Court of the State of Illinois and are members of the Bar of the Northern District of Illinois.

6. No prejudice will result to any of the parties if this Motion is granted.

WHEREFORE, these Defendants pray that this Honorable Court will enter an Order withdrawing the appearances of the above-named attorneys of record, and allowing the substitution and appearances of Richard B. Levy and Juanita B. Rodriguez of Johnson & Bell, Ltd.

Respectfully submitted,

City of Chicago

Dated: July 31, 2009

By: /s/Juanita B. Rodriguez  
One of their attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, hereby certifies that on this 31st day of July, 2009 she caused to be served true and correct copies of this NOTICE OF MOTION FOR WITHDRAWAL AND SUBSTITUTION OF APPEARANCES by causing copies of the same to be served to the following by operation of the CM/ECF System of the U.S. District Court for the Central District of Illinois:

David Alberto Cerda  
Cerda Law Office 440 N. Wabash Avenue  
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Kathleen Dolores Manion  
Tiffany Yvette Harris  
City of Chicago, Law Department  
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Chicago, IL 60602

/s/Juanita B. Rodriguez